

PLEASE TAKE NOTICE that, upon the annexed Declaration of Craig Vielstich, executed on January 25, 2013 and the exhibit attached thereto, the annexed Declaration of Martha A. Koehler, executed on January 25, 2013 and the exhibits attached thereto, and the annexed Declaration of Erica Klipper, executed on January 25, 2013 and the exhibits attached thereto, and the accompanying Memorandum of Law, dated January 25, 2013, and upon all pleadings and proceedings heretofore held, defendants American Express Company, GE Capital Consumer Lending, Inc., Citigroup, Inc. and Citibank N.A., by their attorneys, will move this Court, for an Order (i) pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 1 *et seq.*, compelling arbitration of all claims asserted against defendants in the above-captioned matter; and (ii) pursuant to the Federal Arbitration Act, 9 U.S.C. § 3, staying all remaining proceedings against defendants pending the completion of the arbitration of any claims in this action, and granting such other and further relief as this Court may deem just and proper.

REQUEST FOR ORAL ARGUMENT

In accordance with Part IV-F of the Individual Rules and Procedures of the Honorable Shira A. Scheindlin, defendants request an oral argument on the issues raised in this motion at a date and time to be set by this Court.

Dated: New York, New York
January 25, 2013

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